

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

ELIZABETH SINES et al.,)	CASE NO. 3:17-cv-00072
)	
)	Judge MOON
Plaintiffs,)	
)	
v.)	
)	
JASON KESSLER et al.,)	
)	
Defendants.)	

**DEFENDANTS' OBJECTIONS AND COUNTER DESIGNATIONS IN RESPONSE
TO PLAINTIFFS' DESIGNATIONS OF THE DEPOSITION OF ELLIOTT KLINE**

Defendants Jason Kessler, Nathan Damigo, and Identity Evropa (“Defendants”) object generally to any designation that contains hearsay. Defendants further generally object to any designation that lacks foundation, is irrelevant, or violates R. 403. Defendants reserve the right to designate portions of this deposition not specifically included herein due to the plaintiffs only serving their designations on November 1, 2021 and plaintiffs stating they may present the deposition as early as November, 3, 2021. Defendants further reserve the right to make specific objection not included below for the same reason.

Specific Objections:

- 101: 10-24 Hearsay;
- 106: 1-21 Foundation;
- 110: 18-111:24 Hearsay, foundation;
- 112: 19-113:6 Hearsay;
- 115: 24-117:2 Foundation;
- 150: 13-151:23 Relevance;
- 151: 16-19; Relevance;
- 151: 20-23 Relevance;

158:7-22 Relevance;
158:18-159:2 Relevance;
168:05-169:12 Relevance;
325: 20-327:2 R. 403, Relevance;
430:24-431:22 R. 403, Relevance;
454:19-22 Hearsay;
456: 1-23 Hearsay;

Specific designations:

108: 1-19;
110: 12-14;
129: 7-22;
134: 3-21;
202: 13-203:18;
204: 5-9;
219: 24-220:11;
226: 16-229:12;
260: 20-262:10;
281: 7-23;
282: 4-25;
306: 15-307:15;
308:11-309:2;
328:10-23;
332: 18-334:17.

Respectfully Submitted,
s/ James E. Kolenich

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CERTIFICATE OF SERVICE

A true copy of the foregoing was served via the Court's CM/ECF system on November 3, 2021 upon all parties of record. Parties requiring alternate service were served as listed below:

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